



GLENN COUNTY FARM BUREAU

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April 1, 2011

Katherine Hart, Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114

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RE: Comments on the Irrigated Lands Regulatory Program *Framework*

Dear Chair Hart:

The Glenn County Farm Bureau (GCFB) Board of Directors representing over 800 farm and ranch families in cooperation with the Colusa Glenn Subwatershed Program have compiled the following comments and suggestions in regards to the *Irrigated Lands Regulatory Program Framework*.

GCFB Directors would like to start by thanking you for providing us with your framework in advance; this is an opportunity we greatly appreciate. The GCFB Board of Directors supports the comments and recommendations submitted by the Colusa Glenn Subwatershed Program. Here are a few points that also concern GCFB.

- Regional Board staff, which has been provided all the data and documentation, has expressed the belief that a "linkage" doesn't exist between the Coalition and the growers. Nothing could be further from the truth in the Sacramento Valley. The linkage is the Memorandum of Understanding your Board, the State Water Resources Control Board, and the Butte and Glenn County Agricultural Commissioners signed. The linkage is the Resource Conservation Districts (RCD) who informs growers of water quality regulations and specific standards of water quality objectives. The linkage is the Agricultural Commissioners who educate growers on appropriate spray practices when they renew their private applicator licenses and restricted materials permits. The linkage is the surveys we have our growers fill out about their management practices. The linkage is the documentation we provide to the Regional Board staff through the Coalition. The linkage is the relationship we have successfully developed between our growers and partners over these past seven years.
- The Framework proposes growers complete Farm Evaluations, when they have already filled out surveys. Our growers will not understand the duplication of these efforts. They will be suspicious of providing information directly to the Regional Board, fearing greater regulatory oversight, expecting regular visits from regulators, and exposing them to potential litigation.

- Under the Framework the information we have collected, analyzed and submitted to Regional Board staff will now be subject to comment by "other interested stakeholders". Stakeholders who have no obligation to balance out the needs of the agricultural economy and environment it must work with. The expansion of the process to include other stakeholders in developing water quality management plans will hinder the existing process making it more political rather than scientific. GCFB members have developed a good working relationship in addressing water quality issues.
- Our membership supports separate multiple tiers for surface and groundwater along with the splitting off of irrigated pasture and organic production. These proposed changes will greatly expand the complexity of the program while concurrently degrading the efficacy of the program. The ILRP has a proven record of success and efficacy in dealing with surface water quality concerns. GCFB recognizes ILRP as a success story in Colusa and Glenn Counties, in helping growers comply with water regulations while improving water quality.

The GCFB would like to encourage the Regional Board to consider the size of the Central Valley region and take into consideration the current groundwater data prior to adopting new regulations. This way necessary action and further monitoring can take place where needed and as needed.

Again, we thank you for providing us with this opportunity. The GCFB strongly encourages you to take these comments, and suggestions into consideration. Agriculture is a major factor in California's economy, in our nation's security, the economic lifeblood of many communities in the Central Valley, as well as many other important facets of our communities. Please contact the GCFB office for further questions (530) 865-9636.

Sincerely,



Greg Overton, President
Glenn County Farm Bureau

Cc: Dr. Karl Longley, Regional Board Member
Dan Odenweller, Regional Board Member
Sandra Meraz, Regional Board Member
Lyle Hoag, Regional Board Member
Pamela Creedon, Regional Board Executive Officer
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Joe Damiano, Colusa County Agricultural Commissioner

Jim Donnelly, Glenn County Agricultural Commissioner
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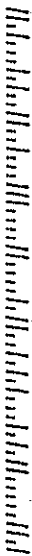
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